UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

JANE DOE)
Plaintiff,)
v.) Civil Action No. 1:18-cv-00390-PB
ST. PAUL'S SCHOOL,)
Defendant.)))

ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO THE COMPLAINT

Defendant St. Paul's School ("St. Paul's") respectfully files this assented-to motion to extend by an additional two weeks, to September 10, 2018, the time for its response to Plaintiff Jane Doe's Complaint.

- 1. Plaintiff filed her complaint in this case on May 11, 2018. Dkt. 1.
- 2. Plaintiff requested on May 22, 2018, that St. Paul's waive service. Dkt. 8.
- 3. St. Paul's filed a waiver of service on June 18, 2018. Dkt. 12.
- 4. The Court previously approved the parties' agreement to extend, from July 23 to August 13, the time for St. Paul's response to Plaintiff's Complaint. Dkt. 14. St. Paul's subsequently submitted another assented-to motion to extend the deadline to August 27, 2018. Dkt. 15.
- 5. St. Paul's School respectfully submits that, at this early stage of the case, good cause exists to extend by an additional two weeks, to September 10, 2018, the time for its response. *See* Fed. R. Civ. P. 6(b)(1)(A).
 - 6. Counsel for the parties have conferred, and Plaintiff assents to this motion.

- 7. Pursuant to Local Rule 7.1(a)(2), counsel submits that no supporting memorandum of law is necessary in order for the Court to rule on this motion.
- 8. Pursuant to Local Rule 7.2(a), counsel further submits that this continuance would not result in the continuance of any other hearing, conference, or trial.

WHEREFORE, St. Paul's respectfully requests that this Honorable Court issue an Order:

- A. Extending to September 10, 2018, the time for St. Paul's response to Plaintiff Jane Doe's Complaint; and
- B. Granting such other relief as is just and proper.

Respectfully submitted,

ST. PAUL'S SCHOOL

By its attorneys,

Dated: August 27, 2018 /s/ Michael J. Connolly

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CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of August, 2018, I served a copy of the foregoing by filing the document through the ECF System to all parties of record.

/s/ Michael J. Connolly
Michael J. Connolly

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